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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**Ex Parte**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**Re: SWBT's CEI Plans for Facsimile Service and PC Backup and  
Recovery (CC Docket Nos. 85-229, 90-623, 95-20)**

Dear Mr. Caton:

Attached are corrected copies of SWBT's response to members of the Policy and Program Planning Division of the Common Carrier Bureau dated January 24, 1996 and January 26, 1996. Changes are indicated in bold type.

If there are any questions regarding the corrected information provided in this letter, or other questions about SWBT's pending CEI plans, please feel free to contact me on 326-8879.

Sincerely,

cc: Rose Crellin  
Blaise Scinto  
Radhika Karmarkar

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Sandra L. Wagner  
Director -  
Federal Regulatory

SBC Communications Inc.  
1401 I Street, N.W.  
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Washington, D.C. 20005  
Phone 202 326-8860



January 24, 1996

**Ex Parte**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**Re: SWBT's CEI Plans for Facsimile Service and PC Backup and  
Recovery (CC Docket Nos. 85-229, 90-623, 95-20)**

Dear Mr. Caton:

As requested by members of the Policy and Program Planning Division of the Common Carrier Bureau, Southwestern Bell Telephone Company (SWBT) hereby provides supplemental information to its Facsimile Service and PC Backup and Recovery CEI Plans that were filed with the Commission on August 3, 1995.

This letter follows up on our related letter of January 11, 1996. In that letter we explained why neither SWBT's Exchange Interconnection Service (EIS), otherwise generally known as Simplified Message Desk Interface (SMDI), nor its Direct Inward Dialing (DID) services are currently tariffed federally. We have now been asked why neither of these services are currently treated by SWBT as Open Network Architecture (ONA) services under the rules promulgated in the Commission's ONA Proceeding (CC Docket No. 88-2, Phase I).

Neither EIS nor DID has sufficient Enhanced Service Provider (ESP) market demand to qualify them as ONA services under the applicable Commission rulings.<sup>1</sup> Only one ESP other than SWBT's affiliated VMS company has subscribed to EIS in recent years, and even that ESP has put in an order to cancel the service effective January 23, 1996. Further, less than 5 percent of SWBT's DID customers are ESPs. (SWBT's VMS affiliate currently uses a combination of EIS and DID services to support its enhanced VMS offerings, depending upon location.)

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<sup>1</sup>The Commission's criteria for services that must be made available under its ONA rules are: (1) technical feasibility; (2) cost feasibility; (3) utility to ESPs' and (4) market demand. Computer III Phase I Order, 104 FCC 2d 958 (1986), para. 217.


Mr. William F. Caton  
January 24, 1996  
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In any event, as stated in the SWBT CEI Plans at issue here, both EIS and DID services are available on a CEI basis in all locations where SWBT or its affiliates will utilize them to support any enhanced service covered by a Commission-approved CEI plan (in fact, both services can be ordered wherever they are technically available throughout SWBT's serving territory without regard to where they are being used to support a Southwestern Bell enhanced service). That would seem to be the only relevant issue within the context of the SWBT CEI plans at issue here.

However, should the Bureau feel that EIS or DID service may properly be treated as ONA services, it could always approve SWBT's pending CEI plans conditioned upon a later inquiry into that separate ONA-related question. SWBT would be happy to provide whatever further information the Bureau may desire in that regard, but urges the Bureau not to withhold approval of SWBT's pending CEI plans -- which have customers waiting to be served -- for resolution of separate ONA-related issues.

If there are any questions regarding the information provided in this letter, or other questions about SWBT's pending CEI plans, please feel free to contact me on 326-8860.

Sincerely,

A handwritten signature in cursive script, reading "Sandra L. Wagner".

Sandra L. Wagner

cc: Rose Crellin  
Blaise Scinto  
Radhika Karmarkar

Sandra L. Wagner  
Director -  
Federal Regulatory

SBC Communications Inc.  
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January 26, 1996

Ex Parte

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**Re: SWBT's CEI Plans for Facsimile Service and PC Backup and Recovery  
(CC Docket Nos. 85-229, 90-623, 95-20)**

Dear Mr. Caton:

As requested by Ms. Radhika Karmarkar of the Policy and Program Planning Division of the Common Carrier Bureau, Southwestern Bell Telephone Company (SWBT) hereby provides supplemental information to its Facsimile Service and PC Backup and Recovery Service CEI Plans that were filed with the Commission on August 3, 1995.

At this time, SWBT does not plan to collocate its enhanced PC Backup and Recovery Service equipment with SWBT's basic network facilities.

In regards to SWBT's enhanced Facsimile Service offering, SWBT does not plan to collocate its enhanced Facsimile Service equipment with SWBT's basic network facilities upon initial deployment of its Facsimile Service offering in Austin, Texas. However, with plans to expand to other major metropolitan areas during 1996 and to outstate areas in 1997, SWBT may collocate its enhanced Facsimile Service equipment with SWBT's basic network facilities. If so, SWBT will comply with those requirements for minimization of transport costs.<sup>1</sup>

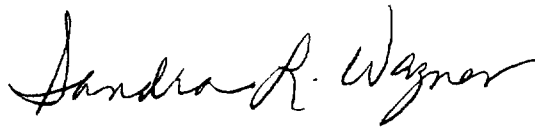
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<sup>1</sup>See Computer III, Phase I Order, para. 164, Phase II Recon Order, n. 261, and Phase II Recon Order, para. 34.

Mr. William F. Caton  
January 26, 1996  
Page Two

If there are any questions regarding the information provided in this letter, or other questions regarding SWBT's pending CEI plans, please feel free to contact me on 326-8860.

Sincerely,

A handwritten signature in cursive script that reads "Sandra L. Wagner". The signature is written in dark ink and is positioned below the word "Sincerely,".

Sandra L. Wagner

cc:    Rose Crellin  
       Blaise Scinto  
       Radhika Karmarkar